

# **EXHIBIT M**

**REQUEST FOR PRODUCTION NO. 1**

All documents referred to, or relied upon, in your answers to the foregoing interrogatories, and identify the interrogatory to which each document produced relates.

**RESPONSE:**

The Debtors object to this Request to the extent it requests documents beyond those sufficient to respond to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case. The Debtors further object to this Request insofar as it requests production of documents in a manner different from how the Debtors have been producing documents to date. The Debtors have produced the documents asked for in the Requests to Box in the same manner the Debtors have been doing throughout the case, and will continue to do so, as necessary.

Notwithstanding the foregoing objections, the Debtors have or will produce relevant, non-privileged, non-objectionable documents responsive to this Request.

**REQUEST FOR PRODUCTION NO. 2**

All documents reflecting plans for capital projects for FWE I, including those documents setting forth the anticipated spend and timing for the projects.

**RESPONSE:**

As discussed on the April 21 Call, the Debtors do not have any capital projects anticipated for FWE I.

**REQUEST FOR PRODUCTION NO. 3**

Any idle iron plan or other plugging and abandonment or decommissioning plan relating to the FWE I Assets.

**RESPONSE:**

The Debtors have already produced responsive documents, which are located in the “FWE – Confirmation Discovery\3 – General” folder.